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November 17, 2023

VIA ECF

The Honorable John G. Koeltl
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *JPMorgan Chase Bank, N.A. v. Avara US Holdings, LLC*, No. 23-cv-7145 (JGK)

Dear Judge Koeltl:

On behalf of JPMorgan Chase Bank, N.A. ("JPM"), we write pursuant to Rule VI.A.2 of the Court's Individual Practices to seek leave to file under temporary seal the unredacted version of the Declaration of Matthew H. Massie ("Massie Declaration") and Exhibit 11 to the Massie Declaration ("Exhibit 11"), filed contemporaneously with JPM's Opposition to Defendant Avara US Holdings, LLC's ("AUS") Motion to Dismiss.

The Massie Declaration and Exhibit 11 contain AUS historical financial information. JPM therefore met and conferred with AUS regarding the filing of these documents, and AUS requested the documents be filed under seal. Pursuant to Rule VI.A.2, JPM is contemporaneously submitting an unredacted version of the Massie Declaration along with Exhibit 11, as well as proposed public version of the Massie Declaration, the redactions to which are narrowly tailored and conceal only the information requested by AUS. JPM has informed AUS that, pursuant to Rule VI.A.2, AUS is required to file a permanent sealing request within three days.

Accordingly, JPM seeks leave to file under temporary seal the unredacted version of the Massie Declaration and Exhibit 11.

Respectfully submitted,

Christopher Harris
Christopher Harris

cc: All Counsel of Record (by ECF)

APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

11/20/23